

THE HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

STATE OF WASHINGTON; STATE OF  
ARIZONA; STATE OF ILLINOIS; and STATE OF  
OREGON,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity as  
President of the United States; U.S. DEPARTMENT  
OF HOMELAND SECURITY; BENJAMINE  
HUFFMAN, in his official capacity as Acting  
Secretary of Homeland Security; U.S. SOCIAL  
SECURITY ADMINISTRATION; MICHELLE  
KING, in her official capacity as Acting  
Commissioner of the Social Security Administration;  
U.S. DEPARTMENT OF STATE; MARCO RUBIO,  
in his official capacity as Secretary of State; U.S.  
DEPARTMENT OF HEALTH AND HUMAN  
SERVICES; DOROTHY FINK, in her official  
capacity as Acting Secretary of Health and Human  
Services; U.S. DEPARTMENT OF JUSTICE;  
JAMES MCHENRY, in his official capacity as  
Acting Attorney General; U.S. DEPARTMENT OF  
AGRICULTURE; GARY WASHINGTON, in his  
official capacity as Acting Secretary of Agriculture;  
and the UNITED STATES OF AMERICA,

Defendants.

NO. 2:25-cv-00127  
UNOPPOSED MOTION FOR  
LEAVE TO FILE BRIEF OF *AMICI*  
*CURIAE* LOCAL GOVERNMENTS  
AND LOCAL GOVERNMENT  
OFFICIALS IN SUPPORT OF  
PLAINTIFFS' MOTION FOR A  
PRELIMINARY INJUNCTION

Noting Date: January 28, 2025

UNOPPOSED MOTION FOR LEAVE TO  
FILE BRIEF OF *AMICI CURIAE* LOCAL  
GOVERNMENTS AND LOCAL GOVERNMENT  
OFFICIALS  
NO. 2:25-cv-00127

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Proposed *Amici Curiae* Local Governments and Local Government Officials move for leave to file an amicus brief in support of Plaintiffs’ motion for preliminary injunction. In furtherance of the motion, Proposed *Amici* state as follows:

1. Proposed *amici* are local governments and local government officials representing 72 jurisdictions across 24 states.

2. They support Plaintiffs’ motion for a preliminary injunction because they, too, will be harmed by the Executive Order that is the subject of Plaintiffs’ lawsuit.

3. This Court “ha[s] broad discretion to admit amicus briefing [...] to assist a case of general public interest.” *Sec. & Exch. Comm’n v. Bittrex Inc.*, No. 2:23-CV-00580-RSM, 2023 WL 4866373, at \*1 (W.D. Wash. July 31, 2023) (granting leave to file where brief provides “assistance in framing the facts and law of this case”).

4. The proposed brief will assist the Court in its consideration of the pending motion, because local governments face immediate harms from the Order that overlap with yet are distinct from the harms individuals, organizations, and states must confront.

5. Among other things, local governments must manage the administrative confusion that the Order will create. Because many local governments issue birth certificates, they will need to develop new systems to ascertain the citizenship of children born in their local hospitals and within city or county lines.

6. The Order also forces Proposed *Amici* to develop new protocols for any programs requiring citizenship verification, because traditional birth certificates will no longer suffice as proof of citizenship. Local communities will also contend with the personal impact to their

1 community members, such as restrictions on federally funded health care coverage, child  
2 services, and educational benefits.

3 7. Counsel for proposed *amici* have conferred with counsel for the parties. Plaintiffs  
4 and Defendants both consent to the request for leave to file.

5 8. A true and correct copy of the proposed brief has been submitted with this motion.  
6

7 **CONCLUSION**

8 For the foregoing reasons, Proposed Local Government *Amici* respectfully request the  
9 Court grant the motion for leave to file the attached brief.

10 Dated: January 28, 2025

11 Respectfully submitted,

12  
13 /s/ Heidi B. Bradley

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